

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

LESLIE CATHERINE SHEEHAN,

Plaintiff(s),

No. C- 96-3931 JCS

v.

SPECIAL VERDICT (PHASE I)

CITY AND COUNTY OF SAN
FRANCISCO, et al.,

Defendant(s).

We, the jury in the above-entitled action, find the following special verdict on the questions submitted
to us:

FIRST SECTION 1983 CLAIM

Question Number 1:

Did defendant John Haggett use excessive force against Mr. Sheehan on November 1, 1995?

Answer: Yes ____ No ____

If your answer to Question Number 1 is “yes,” please proceed to Question Number 2. If your answer
to Question Number 1 is “no,” please proceed to Question Number 3.

SECOND SECTION 1983 CLAIM

Question Number 2:

Did defendant John Haggett act with deliberate indifference to plaintiff Leslie Sheehan’s rights to her
familial relationship with Mr. Sheehan?

Answer: Yes ____ No ____

Please proceed to Question Number 3.

1 NEGLIGENCE

2 Question Number 3:

3 Was defendant John Haggett negligent in killing Mr. Sheehan?

4 Answer: Yes ____ No ____

5 If your answer to Question Number 3 is “yes,” go to Question Number 4. If your answer to Question
6 Number 3 is “no,” go to Question Number 8.

7
8 Question Number 4:

9 Was Mr. Sheehan negligent with respect to the incident that occurred on November 1,
10 1995?

11 Answer: Yes ____ No ____

12 If your answer to Question Number 4 is “yes,” answer Question Number 5. If your
13 answer to Question Number 4 is “no,” go to Question Number 6.

14
15 Question Number 5:

16 Was Mr. Sheehan’s negligence a cause of Mr. Sheehan’s death?

17 Answer: Yes ____ No ____

18 Please proceed to Question Number 6.

19
20 Question Number 6:

21 Was defendant John Haggett’s negligence a cause of injury, damage, loss or harm to
22 plaintiff Leslie Sheehan?

23 Answer: Yes ____ No ____

24 If your answer to Question Number 6 was “yes,” please proceed to Question Number 7. If your
25 answer to Question Number 6 was “no,” please proceed to Question Number 8.

Question Number 7:

If you found in response to Question Number 6 that defendant John Haggett's negligence was a cause of injury, damage, loss, or harm to plaintiff Leslie Sheehan, was the negligence of Mr. Sheehan also a cause of that injury, damage, loss, or harm to plaintiff Leslie Sheehan?

Answer: Yes ____ No ____

Please proceed to Question Number 8.

WRONGFUL DEATH (INTENTIONAL)

Question Number 8:

Did defendant John Haggett commit a battery on Mr. Sheehan?

Answer: Yes ____ No ____

Please proceed to Question Number 9.

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

Question Number 9:

Did defendant John Haggett intentionally inflict emotional distress on Mr. Sheehan?

Answer: Yes ____ No ____

Dated: April ___, 1999

Foreperson